

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARTHA FEDORIW	:	CIVIL ACTION NO.:
	:	
Plaintiff,	:	1:07-CV-07446-HB
vs.	:	JURY TRIAL DEMANDED
	:	
CARL ZEISS VISION, INC.	:	
and	:	
REED EXHIBITION COMPANIES	:	
and	:	
MAUK DESIGN, INC.	:	
and	:	
PINNACLE EXHIBITS, INC.	:	
	:	
Defendants	:	
and	:	
NEW YORK CONVENTION CENTER	:	
OPERATING CORPORATION	:	
	:	
Cross-Defendant	:	

RULE 26(a) INITIAL DISCLOSURES

1(A) Individuals with discoverable information:

Martha Fedoriw
4134 Cambridge Court
Schnecksville, PA 18078
Plaintiff

Ihor N. Fedoriw
4134 Cambridge Court
Schnecksville, PA 18078
Plaintiff's husband and present when she was injured

Lori Fioravanti
Carl Zeiss Vision
2277 Pine View Way
P.O. Box 6006
Petealuma, CA 94955
Present when Plaintiff was injured

Unidentified Zeiss representatives (2)
Address unknown
Present when Plaintiff was injured

Treating physicians and custodian of records at Lehigh Valley Hospital

Treating physicians and custodian of records at Open Air MRI of Allentown

Treating physicians and custodian of records Orthopaedic Specialists

Treating physicians and custodian of records Peripheral Vascular Surgeons

Plaintiff reserves the right to amend and/or supplement this list of individuals.

1 (B) DOCUMENTS AND TANGIBLE THINGS:

Bates-stamped copies of the following documents are being provided herewith to counsel for defendants:

Records of Plaintiff's attendance at the Vision Expo (Bates No. 00001-00004)

Records of Plaintiff's medical care for this incident (Bates No. 00005-000140)

Plaintiff reserves the right to supplement this list.

1 (C) CATEGORIES OF DAMAGES:

- A. Expenses - medical (to be determined).
- B. Loss of income -past and future (to be determined).
- C. Emotional distress - past and future (to be determined).

1 (D) INSURANCE AGREEMENTS:

n/a



Peter A. Greiner
Jack Meyerson, Esquire
Meyerson & O'Neill
1700 Market Street, Suite 3025
Philadelphia, PA 19103
Phone: (215) 972-1376
Fax: (215) 972-0277

DATED: May 13, 2008

CERTIFICATE OF SERVICE

I hereby certify that service of a true and correct copy of the foregoing Plaintiff's Rule 26(a) Disclosures to Defendants made upon counsel listed below by e-mail and United States mail, first class, postage prepaid on May 13, 2008:

Peter Cooper, Esq.
Biedermann, Reif, Hoenig & Ruff
570 Lexington Avenue
New York, NY 10022
pcooper@bhmr.com

Counsel for Defendant Carl Zeiss Vision, Inc.

Angelo Stio, III, Esq.
Pepper Hamilton, LLP
301 Carnegie Center
Suite 400
Princeton, NJ 08543
stioa@pepperlaw.com

Counsel for Defendant Reed Exhibition Companies

Eric Betron, Esq.
Kelly, Rode & Kelly, LLP
330 Old Country Road, Suite 305
Mineola, NY 11501
ebbetron@krklaw.com

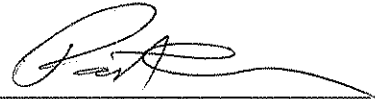
Counsel for Defendant Mauk Design, Inc.

Gregory Walthall, Esq.
Hoey, King, Toker & Epstein
55 Water Street, 29th Floor
New York, NY 10041
gwalthall@hoeyking.com

Counsel for Defendant Pinnacle Exhibits, Inc.

Heidi M. Weiss, Esq.
Law Offices of Edward Garfinkel
110 William Street
New York, New York 10038
heidi.weiss@aig.com

Counsel for Cross-Defendant NYCCOC

A handwritten signature in black ink, appearing to read 'Peter A. Greiner', written over a horizontal line.

Peter A. Greiner